

# McKool Smith

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January 2, 2025

By ECF

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, New York 10007

Re: AMJ Global Entertainment LLC v. Migom Global Corp., et al.  
24 Civ. 6600 (VSB)

Dear Judge Broderick:

This firm represents Juergen Blaha and Michael Herzer, two individual defendants in the above-referenced litigation. We were retained as of December 31, 2024.

We respectfully submit this letter-motion, pursuant to Section I.G of your Honor's Individual Rules & Practices in Civil Cases.

We request that the Court permit Blaha and Herzer until March 3, 2025, to move, answer, or otherwise respond to the Corrected Class Action Complaint, filed on September 13, 2024 (ECF No. 7) (the "Complaint").

Blaha received by Austrian mail a copy of the Complaint on December 13, 2024, and Herzer received the same by Austrian mail on December 20, 2024. We have not determined whether they were properly served under the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters. If they were, their time to move, answer, or otherwise respond to the complaint would be January 3, 2025, and January 10, 2025, respectively. *See* Fed. R. Civ. P. 12(a)(1)(A).

No prior requests for adjournments or extensions of time have been sought.

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Consent of Plaintiff's counsel was sought by e-mail on January 1, 2025, but no response to the request was received as of the filing of this letter-motion.

Blaha and Herzer submit that significant time is necessary to analyze the Complaint and determine how to proceed, including what Rule 12(b) or other motions might be made, and to prepare the necessary materials. No prejudice to Plaintiff would result from the requested extension. As of the date of this letter-motion and based on a review of the Court's docket, none of the other individual defendants has been served or attempted to be served. As of today, neither Defendants Migom Global Corp. nor Migom Bank Ltd. has responded to the Complaint. *See* ECF No. 22 (proof of service on Migom Global Corp., dated Oct. 9, 2024); ECF No. 31 (proof of service on Migom Bank Ltd., dated Dec. 12, 2024).

Blaha and Herzer further request that they be permitted until March 21, 2025, to be heard on the pending motion for appointment of AMJ Global Entertainment LLC as lead plaintiff and AXS Law PLLC as lead counsel (ECF No. 28).

Counsel for Blaha and Herzer is available at the Court's convenience for a pre-motion conference if necessary.

Respectfully submitted,

/s/

Daniel W. Levy

Cc: All Counsel (via ECF)

Blaha and Herzer shall move, answer, or otherwise respond to the Complaint on or before March 3, 2025.

Blaha and Herzer shall file any papers in connection with the pending motion for the appointment of lead plaintiff and lead counsel on or before March 31, 2025.

SO ORDERED:



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The Honorable Vernon S. Broderick  
United States District Judge

January 3, 2025